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**BEFORE THE
DEPARTMENT OF CONSUMER AFFAIRS
BUREAU OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. VN-2006-1359

SCOTT CHRISTOPHER BRADY
27955 Grand Avenue
Sun City, California 92585

A C C U S A T I O N

Vocational Nurse License No. VN 194529

Respondent.

Complainant alleges:

PARTIES

1. Teresa Bello-Jones, J.D., M.S.N., R.N. ("Complainant") brings this Accusation solely in her official capacity as the Executive Officer of the Bureau of Vocational Nursing and Psychiatric Technicians ("Bureau"), Department of Consumer Affairs.
2. On or about March 19, 2001, the Bureau's predecessor, the Board of Vocational Nursing and Psychiatric Technicians, issued Vocational Nurse License Number VN 194529 to Scott Christopher Brady ("Respondent.") Respondent's vocational nurse license was in full force and effect at all times relevant to the charges brought herein and will expire on July 31, 2010, unless renewed.

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1 CAUSE FOR DISCIPLINE

2 (Excessive Force, Mistreatment, or Abuse of a Patient)


3 7. Respondent is subject to disciplinary action pursuant to Code section
4 2878, subdivision (a)(4), on the grounds of unprofessional conduct, in that in and between 2004
5 and 2007, while employed as a home health vocational nurse for Maxim Healthcare Services,
6 Temecula, California, Respondent used excessive force upon or mistreated or abused
7 Bob H., a 20 year old quadriplegic who required total patient care (ventilator maintenance,
8 breathing treatments, suctioning, and G-tube care), as follows: Respondent pulled the patient's
9 hair on a number of occasions when Respondent became irritated, shook the patient's head back
10 and forth, and pushed or moved the patient's head in a rough manner.

11 PRAYER

12 WHEREFORE, Complainant requests that a hearing be held on the matters herein
13 alleged, and that following the hearing, the Board of Vocational Nursing and Psychiatric
14 Technicians issue a decision:

- 15 1. Revoking or suspending Vocational Nurse License Number VN 194529,
16 issued to Scott Christopher Brady;
- 17 2. Ordering Scott Christopher Brady to pay the Board of Vocational Nursing
18 and Psychiatric Technicians the reasonable costs of the investigation and enforcement of this
19 case, pursuant to Business and Professions Code section 125.3; and,
- 20 3. Taking such other and further action as deemed necessary and proper.

21 DATED: August 21, 2008

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23 
24 TERESA BELLO-JONES, J.D., M.S.N., R.N.
25 Executive Officer
26 Board of Vocational Nursing and Psychiatric Technicians
27 Department of Consumer Affairs
28 State of California

Complainant